



are part of MCPS' equity initiative and schools experiencing large renovations that require significant investment in broadband technology.

27. *Ease of Equipment Transfer Rules.* MCPS favors the easing of the equipment transfer rules. The ability to transfer equipment among schools creates flexibility to provide greater support to schools participating in equity initiatives and other programs that serve MCPS' most impacted schools. For auditing purposes, MCPS would still be able to certify equipment locations and demonstrate that the equipment is used for educational purposes.

28. *Budget Calculations.* MCPS favors a fixed five-year budget and supports adjustments to enrollment each year with an appropriate cost of living increase applied to the per student budget calculation. MCPS continues to be a rapidly growing school district, and an annual adjustment to the enrollment count would provide needed funds to serve its growing population.

In conclusion, MCPS appreciates the opportunity to comment on the NPRM.

Respectfully submitted,

/s/ Pete Cevenini

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